

**REMARKS**

Claims 1-41 are currently pending. Claims 1-2, 6, 11-13, 19-21, 27-29, 31-33 and 35-36 have been amended for clarity, without acquiescence or prejudice to pursue in a related application. No new matter has been added. Support for the amendment can be found at least in paragraphs 23-34 and 49 of the originally filed specification.

**Rejections Under 35 U.S.C. § 102**

Claims 1-41 were rejected under 35 U.S.C. § 102(b) as being anticipated by Lee et al., U.S. Patent No. 6,430,731 (hereinafter “Lee”). Applicant respectfully traverses.

Independent claim 1 recites the following limitations (emphasis added):

selecting by a processor one of the plurality of timing events propagated to the input of the gate as a worst case timing event based at least in part upon a load data of the gate, an arrival time in the plurality of different arrival times and a slew in the plurality of different slews of the plurality of timing events.

The support for the amendment can be found at least in paragraphs 23-34. For example, in an embodiment, the delay of a gate depends in part upon the slew of the input transition and the capacitive load at the gate’s output.

Applicant respectfully submits that Lee fails to disclose each and every limitation of the present claims in a manner as recited therein. Lee does not select a timing event based at least in part upon a load data of the gate as claimed.

Lee is directed to methods and apparatus for performing slew dependent signal bounding for signal timing analysis. Specifically, in step 150 and 160 in column 15, lines 44-48 Lee discloses a calculated representative signal.

Signals *representing* the *arrival time and slew* are *computed* at the gate output according to equations (1) and (2) above. Then, in step 160, the *representative* signal (s, a) is *computed* with the arrival time and slew according to equation (26) above. (Emphasis added)

Thus, Lee *calculates* a representative signal without considering the load data of the gate.

Lee considers the gate’s path delays d for the signals such as disclosed in Fig. 10, 11 and 13. Lee’s signal delay is with respect to the slew, not any capacitance load data. For example,

the delay of gate 1 in Lee is disclosed as  $d=0.25*slew + 20$ . It is not based at least in part upon a load data as claimed. Lee is silent with respect to any loads data of the gate in determining the delay. Thus, the delay characteristic of the gate in Lee is not the same as using the gate's load data. Lee calculates with slew and arrival time and is not based on any load data. Therefore, the worse case timing event of Lee is not based at least in part upon a load data of the gate, an arrival time and a slew as claimed.

For at least these reasons, it is respectfully submitted that independent claim 1 is not anticipated by the Lee reference.

For at least these same reasons, it is respectfully submitted that independent claims 6, 11, 19, 29 and 33 are likewise not anticipated by the cited references because they recite a limitation substantially similar to the limitation identified discussed with respect to claim 1 .

Since the remaining claims depend from these independent claims 1, 6, 11, 19, 29 and 33, respectively, these remaining dependent claims are also not anticipated and are therefore allowable over the cited references for the same reasons discussed above with respect to claim 1.

**CONCLUSION**

Based on the foregoing, all claims are believed allowable, and an allowance of the claims is respectfully requested. If the Examiner has any questions or comments, the Examiner is respectfully requested to contact the undersigned at the number listed below.

To the extent that any arguments and disclaimers were presented to distinguish prior art, or for other reasons substantially related to patentability, during the prosecution of any and all parent and related application(s)/patent(s), Applicant(s) hereby explicitly retracts and rescinds any and all such arguments and disclaimers, and respectfully requests that the Examiner re-visit the prior art that such arguments and disclaimers were made to avoid.

The Commissioner is authorized to charge any fees due in connection with the filing of this document to Vista IP Law Group's Deposit Account No. 50-1105, referencing billing number CA7017522001. The Commissioner is authorized to credit any overpayment or to charge any underpayment to Vista IP Law Group's Deposit Account No. 50-1105, referencing billing number CA7017522001.

Respectfully submitted,

Dated: June 2, 2009

**Vista IP Law Group LLP**  
1885 Lundy Avenue,  
Suite 108  
San Jose, CA 95131  
Telephone: (408) 321-8663

By: /Jasper Kwoh/  
Jasper Kwoh  
Registration No. 54,921  
for  
Peter C. Mei  
Registration No. 39,768